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November 9, 2020

Via ECF

Hon. Jesse Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

In re Citibank August 11, 2020 Wire Transfers
No. 1:20-cv-06539-JMF

Dear Judge Furman:

I represent Citibank. As the Court requested at today's conference, I am writing to suggest vendors capable of managing a fully remote trial. I have checked with each of them and all are available to discuss the matter further with Your Honor or your staff.

FTI Consulting: FTI has done remote trials using a Commercial Zoom platform. It just completed one in New Jersey: *Mitsubishi Tanabe Pharma Corp. v. Zydus Pharmaceuticals (USA) Inc.*, in front of the Hon. Freda L. Wolfson. The contact person at FTI is:

Steve Schwartz
Steve.schwartz@fticonsulting.com
(212) 841-9387

Impact Trial Consulting: Impact has done remote trials using a Government Zoom platform. It recently completed the first hybrid trial in the SDNY: *Syntel Sterling Best Shores Mauritius Ltd. v. The Trizetto Group, Inc.*, in front of the Hon. Lorna G. Schofield. The contact person at Impact is:

Jesse Stevenson
jstevenson@impacttrial.com
(917) 722-0801

Court Scribes: Court Scribes has done remote trials in San Francisco and in the Delaware Chancery Court, using a Zoom platform. One notable recent trial is: *In re Appraisal of Regal Entertainment Group*, in front of Vice Chancellor Laster. The contact person at Court Scribes is:

David Blaze
dblaze@courtscribes.com
(833) 727-4237 x700

All three of these vendors can live stream proceedings for public viewing, subject to Court approval.

I previously provided these suggestions to defense counsel. Citibank would be happy with any of these vendors.

Respectfully submitted,

/s/ John F. Baughman

John F. Baughman
Counsel for Citibank

cc: All counsel via ECF